

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER SITE
LITIGATION,

THIS DOCUMENT APPLIES TO ALL WORLD
TRADE CENTER DISASTER LITIGATION

Case No.: 21 MC 100
21 MC 102
21 MC 103
(AKH) (ECF CASE)

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**MEMORANDUM OF LAW
IN SUPPORT OF NOMURA HOLDING AMERICA INC., AND
NOMURA SECURITIES INTERNATIONAL, INC.'S
MOTION TO FILE UNDER SEAL**

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TABLE OF AUTHORITIES

Cases

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

TABLE OF EXHIBITS

Exhibit "A."	1, 2
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PRELIMINARY STATEMENT

Defendants', NOMURA HOLDING AMERICA INC., AND NOMURA SECURITIES INTERNATIONAL, INC. (collectively referred to as "moving Defendants"), move before this Honorable Court to file a confidential letter, with confidential exhibits attached thereto, under seal pursuant to the Individual Rules of the Honorable Alvin K. Hellerstein. As more fully set forth below, the moving Defendants will show that the documents requested to be filed under seal are highly confidential, [REDACTED]

[REDACTED]

[REDACTED].

ARGUMENT

THE MOVING DEFENDANTS' MOTION TO FILE A LETTER AND SUPPORTING EXHIBITS UNDER SEAL SHOULD BE GRANTED SINCE SUCH DOCUMENTS ARE HIGHLY CONFIDENTIAL [REDACTED]

[REDACTED].

The moving Defendants' motion should be granted since the documents requested to be filed under seal are highly confidential [REDACTED]

[REDACTED]

[REDACTED].

Specifically, the moving Defendants seek to file under seal a letter [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

Exhibit "A" attached to the Affirmation of Howard F. Strongin. Additionally, the

letter contains two exhibits, [REDACTED]

[REDACTED] both of which are highly confidential and must be filed under seal. Exhibit "B" and Exhibit "C" attached to the Affirmation of Howard F. Strongin.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

Similarly here, the documents requested to be filed under seal are highly confidential [REDACTED]

[REDACTED] . See Exhibit "A"; see also Exhibit "B"; see also Exhibit "C." [REDACTED]

[REDACTED] . Exhibit "A." As such, and for the reasons stated above, [REDACTED]

[REDACTED], and thus, the moving Defendants' motion must be granted in its entirety.

CONCLUSION

For the foregoing reasons, Defendants NOMURA HOLDING AMERICA INC., AND NOMURA SECURITIES INTERNATIONAL, INC, respectfully request that this Court enter an order pursuant to the Individual Rules of the Honorable Alvin K. Hellerstein, permitting the undersigned to file a confidential letter, with attached confidential exhibits, under seal, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
September 7, 2011

Yours, etc.

STRONGIN ROTHMAN & ABRAMS, LLP

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